

### Remarks

This is in response to the non-final Office Action mailed on June 3, 2005. Claims 1-18 remain pending in the application. Reconsideration and allowance are respectfully requested in view of the following remarks.

Claims 1-18 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bhatt et al., U.S. Patent No. 6,405,191, and Gharachorloo et al., U.S. Patent No. 6,738,868. This rejection is respectfully traversed, and the correctness of the rejection is not conceded.

Claim 1 is directed to a method for filtering one or more messages for transmission to a subscriber computing system according to an individual information request criteria. Claim 1 recites, among other limitations, constructing a binary decision diagram implication graph for each individual information request criteria specified for each subscriber.

A binary decision diagram is a graph that contains a plurality of nodes. Binary decision diagrams are constructed using the "if-then-else" operator instead of "OR" and "AND" operators. For example and without limitation, each node of the binary decision diagram can be constructed by representing sub-expressions of the information requests in an "if-then-else" normal form. To evaluate a binary decision diagram, one starts at the root and each node takes a left or right branch depending on the truth of the test at that node. It is advantageous to use binary decision diagrams to evaluate information requests because binary decision diagrams allow for the use of implications, thereby increasing the efficiency of the system. Application, p. 13, ll. 7-13.

The rejection states that Bhatt discloses construction of a binary decision diagram. This characterization of Bhatt is respectfully traversed for at least the following reasons.

Bhatt discloses a content based publish-and-subscribe system integrated with a relational database system. Bhatt's system allows a user to submit a subscription rule, which is parsed and normalized into a series of expressions joined by disjunctive operators (e.g., "OR"). Bhatt, col. 5, lines 48-59. Each disjunctive expression is treated as a separate subscription rule and is stored in an "Array of Rules." Bhatt, col. 5, lines 61-63. An incoming message is evaluated using the disjunctive expressions. See Bhatt, col. 5, line 55 - col. 10, line 50.

Bhatt therefore discloses use of an array of rules including a plurality of expressions joined by disjunctive operators, such as the "OR" operator. The array of rules disclosed by Bhatt is not a binary decision diagram which, as described above, is constructed using the "if-then-

else" operator rather than the "OR" operator. Bhatt therefore does not disclose or suggest construction of a binary decision diagram implication graph, as recited by claim 1.

Gharachorloo is likewise silent with respect to construction of a binary decision diagram.

Reconsideration and allowance of claim 1, as well as claims 2-6 that depend therefrom, are therefore respectfully requested.

Claim 7 is directed to a computer program product readable by a computer system. Claim 7 recites, among other limitations, constructing a binary decision diagram implication graph. Claim 7 is therefore allowable for at least reasons similar to those provided above with respect to claim 1. Reconsideration and allowance of claim 7, as well as claims 8-12 that depend therefrom, are respectfully requested.

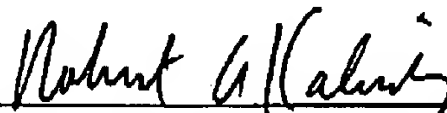
Claim 13 is directed to a publication-subscription broker server computing system. Claim 13 recites, among other limitations, a programmable processing module performing a sequence of operations, including constructing a binary decision diagram implication graph. Claim 13 is therefore allowable for at least reasons similar to those provided above with respect to claim 1. Reconsideration and allowance of claim 13, as well as claims 14-18 that depend therefrom, are respectfully requested.

The remarks set forth above make certain arguments in support of the patentability of the pending claims. The applicant respectfully notes that there may be other reasons that the pending claims are patentably distinct over the cited references and reserves the right to raise any such reason or argument in the future.

Favorable reconsideration in the form of a Notice of Allowance is respectfully requested. Please contact the undersigned attorney with any questions regarding this application.

Respectfully submitted,  
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Date: August 25, 2005

  
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